

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION**

**UNITED STATES OF AMERICA**

:

**v.**

:

**ROGER ALLAN BELLINI**

:

**: Case No. 7:19cr00095**

:

**ADDENDUM TO THE GOVERNMENT'S SENTENCING MEMORANDUM**

COMES NOW the United States of America by counsel and hereby submits this addendum to its sentencing memorandum filed on February 25, 2021. The attachment to this addendum contains a request for restitution by “April” received by the Government on March 2, 2021. April is the victim from the “aprilblonde” series of child pornography images and a victim of Count Six of the indictment. To date, April has not received restitution for the full amount of her losses. The request contains a victim impact statement from April, a psychological evaluation from January 2021 detailing approximately \$226,375 in anticipated treatment costs, and an affidavit from her attorney detailing at least \$4,575 in legal expenses. The attachment also contains an email from Mr. Bellini’s counsel offering \$3,000 in restitution and an email from the victim’s counsel on March 3, 2021 agreeing to accept \$3,000 in restitution. The Government requests that the attachment to this addendum be placed under seal.

Respectfully submitted,

DANIEL P. BUBAR  
Acting United States Attorney

Date: March 3, 2021

/s/ Rachel Barish Swartz

Rachel Barish Swartz  
Assistant United States Attorney  
New York State Bar No. 4667044

Western District of Virginia  
P. O. Box 1709  
Roanoke, VA 24008-1709  
Tel: (540) 857-2250  
Fax: (540) 857-2283  
Email: rachel.swartz@usdoj.gov

/s/ Eduardo Palomo  
Eduardo Alberto Palomo  
Trial Attorney  
Texas Bar No. 24074847  
United States Department of Justice  
1301 New York Ave NW  
Washington, D.C. 20005  
Tel: (202) 305-9635  
Email: Eduardo.palomo2@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF which will send a copy of said filing to counsel for the defendant.

/s/ Rachel Barish Swartz  
Assistant United States Attorney